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October 9, 2001

18175

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C St. SW., Washington, D.C. 20204

Re:

Notification for Statements on Dietary Supplement Labels

Dear Sir/Madam:

This firm represents Nature's Sunshine Products, Inc., Provo, Utah, a manufacturer and distributor of dietary supplement products (hereinafter "Nature's Sunshine"). Nature's Sunshine has requested that we notify your Agency on its behalf of the inclusion of statements of nutritional support on its dietary supplement product labels.

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. §343(r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your Agency is hereby notified that Nature's Sunshine has made statements of "nutritional support", as described in 21 U.S.C. §343(r)(6)(A), for its dietary supplements as follows:

Product Name

Label Statement

Super GLA

Supports female health during PMS. GLA play a role in proper nerve development and function. Maintains circulatory system and liver. Glandular, circulatory and nervous system support.

Milk Thistle Combination (LIV-Guard)

Powerful antioxidant for liver protection. A combination of herbs and vitamins designed to provide nutritional support for the liver. Digestive system support.

975 0162 LET 8704

Liquid Chlorophyll 16 Fl. Oz.

Digestive tract detoxifier. Supports intestinal health. Supports circulatory health. Intestinal and circulatory system support.

IGF-1

Anti-aging formula. Improves energy and endurance. IGF-1 is produced in the body as a by-product of human growth hormone. IGF-1 is associated with muscle growth and increased energy. Also supports health joints and sexual performance. It boosts the immune system and has anti-aging properties.

Collatrim Plus

Weight management. Joint and skin health. Weight management and structural support.

Liquid Vitamin B12

Promotes energy. Boosts general well-being.

Carotenoid Blend

Potent antioxidant activity. Cardiovascular support. Eye health. Immune enhancement.

Vital nutrition support.

Lutein

Powerful antioxidant. Supports macular function and overall eye health. Supports breast health.

Vital nutrition support.

Cholester-Reg II

Maintains cholesterol levels that are already in the

normal range. Circulatory system support.

Female Comfort

Supportive for menopausal women. Maintain balance in the female glandular system. Glandular

system support.

Liquid Calcium with Magnesium,

Zinc and Vitamin D

To support healthy bones. Liposomes for enhanced bioactivity. Maintain pH balance.

Structural system support.

Focus Attention Powder

Formulated to help people focus attention. Supports normal brain stimulation levels. Supports blood circulation and neurotransmitters in the brain. Helps modulate brain activity and energy levels. Nervous and circulatory system support.

SugarReg

Helps maintain blood sugar levels that are already within the normal range. Glandular and digestive system support.

Astragalus

Helps stimulate immune response. Adaptogenic herb - helps the body cope with daily stress. Immune system support.

Red Clover Blend 2oz.

Circulatory system support.

Super Algae

Optimal nutritional balance formula. Maximizes protein, amino acid, chlorophyll and beta-carotene content of each specific algae. General nutritional support.

Pro-Pancreas Formula

Supports proper pancreas function. Natural source of trace minerals. Supports blood sugar levels already in the normal range.

The undersigned hereby certifies on behalf of Nature's Sunshine that the information contained in this correspondence is complete and accurate.

Sincerely yours,

GRONEK & ARMSTRONG

Robert E. Armstrong

PJW:REA:

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CC: Nature's Sunshine Products, Inc.